

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CENTRAL STATES, SOUTHEAST AND)
SOUTHWEST AREAS PENSION FUND,)
and HOWARD McDougall, trustee,)
)
)
v.) Case No. 08 C 482
)
)
Plaintiffs,) Honorable
) District Judge Kennelly
BLOM TRUCKING, INC.,)
an Ohio corporation,)
)
Defendant.)

NOTICE OF MOTION

TO: Charles M. Miller
Keating Muething & Klekamp, PLL
One East Fourth Street, Suite 1400
Cincinnati, Ohio 45202

PLEASE TAKE NOTICE that on September 10, 2008, at the hour of 9:30 a.m., or as soon thereafter as counsel may be heard, the Plaintiffs' attorney will appear before the Honorable Judge Matthew F. Kennelly, District Judge of the United States District Court for the Northern District of Illinois, located at 219 South Dearborn Street, Room 2103, Chicago, Illinois, or such other Judge as may be in his stead, and present the attached Plaintiffs' Motion to Vacate Order to Show Cause Without Prejudice.

Respectfully submitted,

/s/ Rebecca K. McMahon
Rebecca K. McMahon
Attorney for Plaintiffs
Central States, Southeast and Southwest Areas
Pension Fund
9377 West Higgins Road
Rosemont, Illinois 60018-4938
847/518-9800, Ext. 3441
ARDC #06290192

September 3, 2008

CERTIFICATE OF SERVICE

I, Rebecca K. McMahon, one of the attorneys for Plaintiffs Central States, Southeast and Southwest Areas Pension Fund, certify that on the 3rd day of September, 2008, I caused the foregoing Plaintiffs' Motion to Vacate Order to Show Cause Without Prejudice to be filed electronically. This filing was served on all parties indicated on the electronic filing receipt via the Court's electronic filing system. For all other parties, who are listed below, I served the foregoing Notice of Motion and Motion by mailing said documents to:

Charles M. Miller
Keating Muething & Klekamp, PLL
One East Fourth Street, Suite 1400
Cincinnati, Ohio 45202

Said documents were deposited in the United States Mail at 9377 West Higgins Road, Rosemont, Illinois, 60018-4938, with proper prepaid postage affixed thereto, this 3rd day of September, 2008.

/s/ Rebecca K. McMahon
Rebecca K. McMahon
One of Central States' Attorneys